
EXHIBIT H

PUBLIC SERVICE COMMISSION
OF WEST VIRGINIA
CHARLESTON

CASE NO. 02-0254-T-C

RESPONSE OF VERIZON WEST VIRGINIA INC.
TO THE THIRD SET OF DATA REQUESTS AND
REQUESTS FOR PRODUCTION OF DOCUMENTS

SEPTEMBER 16, 2002

REQUEST FOR PRODUCTION NO. 110: If you contend that it was technically infeasible to interconnect with NCC at 405 Capitol Street, Charleston, WV 25301, using CLLI code CHTNWV93H04 when NCC requested interconnection at that specific location, describe, in detail, any and all facts which support that contention.

RESPONSE:

See Verizon WV's response to Request No. 109. If NCC's understanding is that CLLI Code CHTNWV93H04 referred to an existing shared end-user loop multiplexer located at 405 Capital Street in Charleston, West Virginia, then Verizon responds as follows: The existing shared end-user loop multiplexer located at 405 Capital Street in Charleston, West Virginia is an OC-3 Multiplexer (capacity of "3" DS-3's) that was already serving "2" DS3's. NCC's 1Q2001 initial capacity requirements for 3+ DS-3's (as indicated in its forecast) would have immediately exhausted this equipment, requiring the construction of a new/additional fiber optic multiplexer, which is what Verizon West Virginia did.

EXHIBIT "H"